

**UNITED STATES DISTRICT COURT**for the  
Southern District of Texas

NOV - 7 2019

David J. Bradley, Clerk of Court

United States of America )

V. )

Baldemar Abdiel VELIZ )*Defendant(s)* )

Case No.

B-19-1089-MJ

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 17, 2019 in the county of Willacy in the Southern District of Texas, the defendant(s) violated:

*Code Section*

Title 16, United States Code, Section 1538(a)(1)(G)

*Offense Description*


(a) Generally (1) Except as provided in sections 1535(g)(2) and 1539 of this title, with respect to any endangered species of fish and wildlife listed pursuant to section 1533 of this title it is unlawful for any person subject to the jurisdiction of the United States to- (G) violate any regulation pertaining to such species or to any threatened species of fish or wildlife listed pursuant to section 1533 of this title.

This criminal complaint is based on these facts:

On August 17, 2019 Texas Parks and Wildlife game wardens working under a Joint Enforcement Agreement with the National Oceanic and Atmospheric Administration, Office of Law Enforcement responded to a complaint of subjects catching and killing sea turtles at the Port Mansfield Jetties. Responding game wardens located VELIZ, Baldemar Abdiel in the City of South Padre Island who was found to be in possession of green sea turtle parts. During interview, VELIZ, Baldemar Abdiel admitted to game wardens that he knowingly and intentionally caught, killed, and butchered the green sea turtle at the Port Mansfield Jetties.



Continued on the attached sheet.

*Complainant's Signature*

Matthew C. Roberson, Special Agent

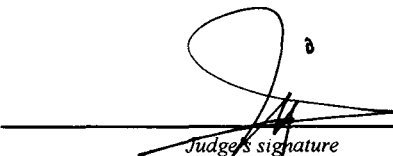
*Printed name and title*

Sworn to before me and signed in my presence.

11/7/2019

*Date*

Brownsville, Texas

*City and State**Judge's signature*

Ignacio Torteza, III U.S. Magistrate Judge

*Printed name and title*